

Richard Mathews

Program Manager- National Organic Program
USDA-AMS-TMP-NOP
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Washington, DC 20250-0020

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USDA NATIONAL
ORGANIC PROGRAM

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Re: Support of NOSB's recommendation for a rule change

Dear Mr. Mathews

I am writing to express full support of the National Organic Standards Board's recommendation for a rule change & the NOSB's guidance draft regarding pasture requirements for the National Organic Program. As a consumer, I demand that the USDA organic seal represents the true meaning of "organic" which includes pasturing of animals as outlined in the Organic Foods Production Act of 1990 and the National Organic Program Standards.

Providing cows with access to pasture assures that organic principles are being met, with an interrelated system between the animals and the land, working from the soil up to promote an interdependent community. Pasture provides benefits to cows that include improved foot and leg strength, reduced breeding problems, less stress, lower culling rates, and enhanced immunity. Ruminants with access to pasture help ensure an organic production system that provides living conditions that allow animals to satisfy their natural behavior patterns, provides the animals with preventative health care benefits, and improves humane animal care and their welfare.

These benefits are passed down to consumers through more nutritious milk. A recent study conducted by the Danish Institute of Agricultural Research tested milk from cows farmed organically and found that it was 50% higher in Vitamin E, 75% higher in beta carotene and higher in omega 3 essential fatty acids than conventional milk. This study tied these qualities to organic cows having room to graze and a diet high in forage, fresh grass and clover.

Animals utilizing pasture naturally also avoids the concentration of manure issues associated with dry lot production. Allowing the cows to go to their food rather than bringing feed to the cows substantially reduces the use of non-renewable resources and machinery required for feed transportation.

Responsible active management of quality pasture is an excellent way to improve soil quality. Careful management of pasture ensures maximum utilization of the capture of solar energy, the basis of growing food. Allowing some pasture areas to be fallow for a portion of the season benefits biodiversity by providing habitat for grassland birds.

I firmly believe requiring pasture for ruminants promotes a sustainable agricultural system, providing multiple benefits to the animals, environment and consumers of organic products. For these reasons, I request that the National Organic Program accepts the NOSB's recommendation for a rule change and the draft guidance document that states grazed feed must provide a significant portion of total feed requirements, including during the stage of lactation. These standards are expected of organic farms, and food marketed under the USDA organic seal, and should not be compromised.

Sincerely,

Signature

Name

Address

City, State, Zip

J. Rowe

J. Rowe

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